

Plaintiffs' Exhibit 98

In the Matter Of:

United States vs

Google

KENNETH MARCO HARDIE

November 14, 2023



<p>1 KENNETH MARCO HARDIE 2 having been duly sworn, testified as follows: 3 EXAMINATION 4 BY MS. CLEMONS: 5 Q. Okay. Mr. Hardie, I'm Katherine Clemons. We met off the record, but I will introduce myself, for the record. 6 I'm an attorney with the United States antitrust division. 7 Can you please state and spell your full name for the record? 8 A. Sure. Kenneth Marco Hardie, K-e-n-n-e-t-h, M-a-r-c-o, H-a-r-d-i-e. 9 Q. And Mr. Hardie, do you go by Marco? 10 A. Yes. 11 Q. And are you currently working at Google, LLC? 12 A. Yes. 13 Q. What is your position with Google? 14 A. My title is head of industry. 15 Q. What does that mean, head of industry? 16</p>	<p>1 A. I lead the sales team associated with Google, specifically government and advocacy, within the government advocacy protocol. 2 Q. And is that specific to Google's ad's business or all Google products? 3 A. It is specific to Google's ad business. 4 Q. Okay. 5 A. So within that search video and then the display. 6 Q. So is the industry the government industry or what is industry referring to in your title, if you know? 7 A. It is referring to the industry, itself, like there are a number of heads of industry across Google, and it pertains to the specific what we would call vertical, that they work in, that's how we would define it or how we would use the term, which is the various industries that we serve. 8 Q. And what is the vertical that you</p>
<p>1 are the head of industry for? 2 A. I work within the government and advocacy vertical. 3 Q. Okay. And you said you lead the sales team for Google's products to government, and I don't know what advocacy is, but to government clients? 4 A. Primarily government clients, yes, I lead a sales team. 5 Q. Okay. Are there other people who lead sales teams, selling Google's advertising products to government clients? 6 A. Yes. 7 Q. Who are those other people at Google? 8 A. Can -- rephrase the question again so I -- I'm trying to understand the universe of people you're asking for. 9 Q. Yeah, you had mentioned that you lead a sales team. 10 A. Yes. 11 Q. Are there other sales teams, led by</p>	<p>1 other people, within that government and advocacy vertical? 2 A. Yes. 3 Q. And who leads those sales teams? 4 A. They would be other heads of industry. 5 Q. Okay. And what would other heads of industry be doing, that is different from what you and your sales team do? 6 A. They essentially do the same thing. 7 The difference would be the particular industry they serve. 8 And so within government and advocacy, for example, that covers the United States government, that covers major non-profits, it covers election advertisers. 9 So my other colleagues within government advocacy represent different elements of those, of the public sector. 10 Q. Okay. So yours, your responsibilities for your sales team, are the United States government, major non-profits, and</p>

<p>1 federal agency advertiser purchases?</p> <p>2 A. Yes. I mean, when we're talking</p> <p>3 about metrics I am generally thinking about</p> <p>4 campaign metrics or media metrics, and so</p> <p>5 there's a distinction. There's definitely a</p> <p>6 distinction between revenue and campaign metrics</p> <p>7 or media metrics.</p> <p>8 Q. And are those two terms</p> <p>9 interchangeable for you, campaign metrics and</p> <p>10 media metrics?</p> <p>11 A. They can be, but not necessarily.</p> <p>12 Q. Okay. What do you mean by campaign</p> <p>13 metrics?</p> <p>14 A. So a campaign metric can be</p> <p>15 associated with a specific campaign. Whereas, I</p> <p>16 say a media metric, I am tending to think a</p> <p>17 little bit more broadly. So there may be one --</p> <p>18 you know, let's say, for example, the -- the</p> <p>19 census may have a number of campaigns running,</p> <p>20 so we may care about -- and each of those</p> <p>21 campaigns may have a different goal, right?</p> <p>22 Q. Okay.</p>	<p>Page 62</p>	<p>Page 63</p>
<p>1 is a lagging indicator for us helping them reach</p> <p>2 their goals.</p> <p>3 Q. Okay. Do you have any estimate of</p> <p>4 about how much of your team members' time is</p> <p>5 spent supporting the federal agency advertisers</p> <p>6 as opposed to the other advertiser accounts in</p> <p>7 their portfolio?</p> <p>8 MR. RYBNICEK: Objection to the --</p> <p>9 objection to form.</p> <p>10 A. Broadly, but not within my -- very</p> <p>11 broadly.</p> <p>12 Q. What is your broad estimate?</p> <p>13 A. And currently, I would say</p> <p>14 currently, because, again, over the course of my</p> <p>15 career with Google who is spending money when</p> <p>16 and what time obviously can vary.</p> <p>17 Currently, I would say they</p> <p>18 probably spend two-thirds of their time on US</p> <p>19 government advertisers.</p> <p>20 Q. Okay. Is that your entire team or</p> <p>21 just the two that we talked about, that are</p> <p>22 supporting I believe it was USPS?</p>	<p>Page 64</p>	<p>Page 65</p>

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1	as well, covering those areas.	1 your counsel during the break about the
2	MS. CLEMONS: Okay. We've been	2 testimony that you've given, broadly?
3	going about an hour, I don't know if you want to	3 A. Doing a good job.
4	take a break? I'm happy to keep going.	4 MR. RYBNICEK: Objection,
5	MR. RYBNICEK: Do you?	5 objection, ask you -- instruct you not to answer
6	THE WITNESS: Yeah.	6 to the extent it would reveal communications
7	THE VIDEOGRAPHER: Off the record.	7 with attorneys, your attorneys.
8	The time is 3:08.	8 BY MS. CLEMONS:
9	(Recess.)	9 Q. First of all, are you going to take
10	THE VIDEOGRAPHER: On the record.	10 the instruction of your counsel?
11	The time is 3:24.	11 A. Yes.
12	BY MS. CLEMONS:	12 Q. Did your attorneys tell you --
13	Q. All right. We are back from break.	13 get -- provide you any information or talk to
14	Mr. Hardie, did you have any	14 you about specific testimony that you gave or
15	discussions with your counsel while we were on	15 testimony that you should give?
16	break?	16 A. No.
17	A. Yes.	17 Q. Okay. Okay.
18	Q. And did you discuss the -- the	18 A couple of things, before we went
19	substance of your testimony or any of the	19 on break I think at one point you had mentioned
20	testimony that you've given so far today?	20 that sales connect was, like, a CRM platform?
21	A. Broadly.	21 A. Mm-hmm.
22	Q. Okay. What did you discuss with	22 Q. By CRM are you referring to
	Page 68	Page 69
1	customer relationship management?	1 were making sure we were, like, tracking and
2	A. Yes.	2 hitting those types of things. So that might be
3	Q. Okay. Do you -- do you, your team	3 an example of something where -- but it's not
4	or Mr. Harrison's team, track any information	4 tracking revenue, if that's the question.
5	about the federal agency advertisers outside of	5 Q. Okay. For the other metrics, the
6	sales connect?	6 campaign metrics or the business metrics we
7	A. No.	7 talked about before, are those being tracked in
8	Q. Okay. You don't have any, like,	8 sales connect or in some other system or
9	Excel trackers that you're keeping?	9 document?
10	A. Oh, no, there could be -- there	10 A. No, it is probably within Connect
11	could be an Excel tracker for various things.	11 Sales or Google Ads, I should say, if you're
12	Q. Okay. Do you -- can you think of	12 talking about campaign metrics, Google Ads.
13	any examples of Excel trackers that you keep	13 Q. Okay. So that is, like, a Google
14	related to the federal agency advertisers?	14 Ads?
15	A. Most of the time our internal	15 A. It's the platform.
16	trackers are, like, related to our work.	16 Q. Okay.
17	There's more of a dashboard I can use as an	17 A. It is the platform, so if someone's
18	example, on the census we were keeping track of	18 operating in the platform, wherever they are,
19	their, like, search impression data, so search	19 ads are being purchased, that is where campaign
20	impression -- not search impression data, search	20 performance is typically tracked.
21	impression chair, because they had a goal of	21 Q. Okay. And are you running reports
22	north of 90 percent impression chair. So we	22 out of the Google side of Google Ads?

<p>1 the eight federal agency advertisers?</p> <p>2 A. I believe she worked on the army.</p> <p>3 She did some stuff on the census.</p> <p>4 Q. Okay. Does your team produce up or</p> <p>5 out any periodic reports or presentations to</p> <p>6 you, whether your supervisors or other -- other</p> <p>7 teams at Google in the ad space?</p> <p>8 A. When you say present up or out</p> <p>9 reports, like, what do you mean?</p> <p>10 Q. Yeah, so is your team reporting out</p> <p>11 to other parts of -- of Google on the</p> <p>12 performance of your client accounts, for</p> <p>13 example?</p> <p>14 A. When you say: Other parts of</p> <p>15 Google, I mean, there's our natural reporting</p> <p>16 chains to my director. I might have, obviously,</p> <p>17 a conversation with my director on how things</p> <p>18 are going and potentially, at periodic times,</p> <p>19 like, our VP.</p> <p>20 But in terms of out to other parts</p> <p>21 of Google, related to the performance of</p> <p>22 campaigns, broadly, no.</p>	<p>Page 78</p>	<p>Page 79</p>
<p>1 question, the answer is no.</p> <p>2 Q. Okay.</p> <p>3 A. Because they don't do it.</p> <p>4 Q. But your team isn't having a</p> <p>5 regular meeting with the platform team about</p> <p>6 government accounts or anything like that?</p> <p>7 A. That -- I mean, again, technically,</p> <p>8 in that sense, as other times -- for an example,</p> <p>9 if I have my team meeting, and we're talking</p> <p>10 about our accounts, could someone from, like,</p> <p>11 the account executive, the programmatic account</p> <p>12 executive that covers the accounts be present in</p> <p>13 the meeting, of course, yes.</p> <p>14 But I would not -- I would not</p> <p>15 characterize it as, like, presenting out to</p> <p>16 other areas of Google. They are -- they sit</p> <p>17 within kind of, like, the normal course of</p> <p>18 business of how our team operates.</p> <p>19 Q. Okay. Do you know who Tiffany</p> <p>20 Miller is?</p> <p>21 A. I do.</p> <p>22 Q. Who is Tiffany Miller?</p>	<p>Page 80</p>	<p>Page 81</p>

<p>Page 82</p> <p>1 agencies responsible for the census. I mean, 2 the simplest, my goal was to help us be a good 3 partner to the advertising agencies that were 4 responsible for executing the census.</p> <p>5 Q. Okay. And were you also trying to 6 be a good platform partner or vendor for the 7 census?</p> <p>8 A. I mean, ultimately, we want to do a 9 good job, and so we want the census to be happy 10 with the work that we're doing for them.</p> <p>11 Q. Do you recall there being any 12 issues, at any point, with the execution of the 13 census campaign in 2020?</p> <p>14 MR. RYBNICEK: Objection to form.</p> <p>15 A. The 2020 campaign is -- was, quite 16 possibly, the largest media campaign in the 17 history of government. The census -- the 2020 18 census is, quite literally, outside of war, the 19 2020 census is the largest mobilization of the 20 US government. So I can imagine there were 21 complications and issues along the way.</p> <p>22 Q. Realizing it's been several</p>	<p>1 years --</p> <p>2 A. Yeah.</p> <p>3 Q. -- do you recall a time when the 4 wrong URL was white listed by Google's team and 5 it caused census's ads to go dark for a period 6 of a couple of days?</p> <p>7 A. I do not recall that.</p> <p>8 Q. Okay. Do you know what a make good 9 is?</p> <p>10 A. Yes.</p> <p>11 Q. What is a make good?</p> <p>12 A. A make good is essentially a 13 credit, essentially an ad credit that can be 14 delivered.</p> <p>15 Q. Okay. And what is the reason that 16 an ad credit would be delivered as a make good?</p> <p>17 A. It's very broad.</p> <p>18 Q. What are some examples of reasons 19 that a make good could be delivered?</p> <p>20 A. It can range from something not 21 running the way that it was supposed to, some 22 sort of bug that caused an issue, but it can</p>
<p>Page 84</p> <p>1 range all the way to somebody at an ad agency 2 clicked the wrong thing and an ad didn't 3 surface. There's a wide range of reasons why 4 someone could -- almost -- why that make good 5 should be issued.</p> <p>6 Q. Okay. And is there an approval 7 process for make goods?</p> <p>8 A. Once it -- there are certain levels 9 associated with how large the make good is, that 10 would trigger certain levels of approval.</p> <p>11 Q. Okay. And who would handle a 12 request for a make good from an advertiser, from 13 a federal agency advertiser at Google?</p> <p>14 A. So when you said -- again, when you 15 say a federal advertising agency advertiser 16 requesting a make good, very like -- very likely 17 would not be coming from the federal agency 18 advertiser, it would be coming from the 19 advertising agency, themselves, because the -- 20 any make good would be going to the advertising 21 agency, because it is their account, 22 essentially, that is -- had some issue, and they</p>	<p>Page 85</p> <p>1 would need something to be made good.</p> <p>2 Q. Right. But are they -- strike 3 that.</p> <p>4 The ads that are being purchased --</p> <p>5 A. Mm-hmm.</p> <p>6 Q. -- are ads for the advertiser; 7 right?</p> <p>8 A. In theory, yes.</p> <p>9 Q. Okay. So we're talking about 10 situations where an advertiser is -- is 11 purchasing ads through Google platforms through 12 their ad agency?</p> <p>13 MR. RYBNICEK: Objection to form.</p> <p>14 A. Yeah, I mean, like, the advertising 15 agency is purchasing the ads. And, in 16 particular, we were talking about the census, 17 especially, but there is an advertising agency 18 that owns that seat, for lack of a better word, 19 that owns that -- that ads -- that GMP placed in 20 order to buy ads. So that make good would quite 21 literally go to them, in theory, that could go 22 to them, and we don't know where it goes after</p>

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<p>1 A. We didn't get into -- we weren't 2 going -- we weren't going -- if your question is 3 we were not going through this level of detail 4 in terms of individual GMP contracts.</p> <p>5 MR. RYBNICK: Counsel, we're going 6 to object, because I don't think the topic calls 7 for a legal understanding of the terms effect. 8 He was prepared on -- in understanding what 9 contracts exist and what terms are contained in 10 them.</p> <p>11 Asking questions about what the 12 legal effect of terms are goes beyond the scope 13 of the topics in the 30(b) (6) notice.</p> <p>14 MS. CLEMONS: Can we go off the 15 record?</p> <p>16 THE VIDEOGRAPHER: Off the record. 17 The time is 4:06.</p> <p>18 (Recess.)</p> <p>19 THE VIDEOGRAPHER: On the record. 20 The time is 4:08.</p> <p>21 BY MS. CLEMONS:</p> <p>22 Q. Mr. Hardie, did you discuss any</p>	<p>1 other contract terms, besides the -- did you 2 prepare to testify as to any other contract 3 terms, besides the -- which platforms the ad 4 agencies have agreements with respect to?</p> <p>5 A. I would not characterize my prep as 6 focused on specific contract terms.</p> <p>7 Q. Okay. So do you know what the 8 platform fees are for DV360 for the federal 9 agency advertisers?</p> <p>10 A. So in this case, there wouldn't be 11 plays and fees, agency platform fees specific 12 for the advertiser, because the advertising 13 agency is who has the seat or who has the 14 contract with Google.</p> <p>15 And many times, like, again, to 16 example we use with Google is a massive 17 conglomerate of agencies, which does billions of 18 dollars with revenue through GMP across many, 19 many clients over the course of, you know, a 20 year, and so I -- I would -- I cannot speak to 21 what volume discounts each holding company would 22 have, so I -- I don't -- I don't know.</p>
<p>1 Q. Okay. Do you know whether there 2 are any contracts with advertising agencies that 3 are specific to particular advertisers, 4 particularly federal agency advertisers?</p> <p>5 A. Can you repeat the question or 6 rephrase the question?</p> <p>7 Q. Does Google have any contracts with 8 advertising agencies that are specific to a 9 particular advertiser?</p> <p>10 A. Current contracts, I'm not -- I 11 can't say for sure.</p> <p>12 Q. Do you know if Google had any 13 contracts with advertising agencies related to 14 the 2020 decennial census campaign?</p> <p>15 A. Yes.</p> <p>16 Q. Were they specific to census?</p> <p>17 A. There were specific parts of GMP 18 contracts that were related to census.</p> <p>19 Q. What specific parts of GMP 20 contracts were related to census?</p> <p>21 A. So the census, itself, was, again, 22 as we've talked about earlier, an incredibly</p>	<p>1 large and complicated campaign. There were at 2 least eight media agencies buying media, and 3 they were all doing it through -- the plan was 4 for them to do it through the Wave Maker Seat, 5 which is one the agencies there. And the only 6 way that we could -- or the campaign, itself, 7 could effectively be managed was if it was all 8 bought through the Wave Maker Seat.</p> <p>9 That is not normal practice, 10 because normally multiple advertising agencies 11 aren't working on the same campaign in that way. 12 And so there were certain things that we had to 13 do or that Google had to do in order to allow 14 the census agencies, the advertising agencies, 15 to be able to operate within -- within that 16 instance to execute the campaign.</p> <p>17 Q. Okay. So in that case, in the case 18 of the census 2020 campaign --</p> <p>19 A. Mm-hmm.</p> <p>20 Q. -- Google executed specific 21 contracts with Wave Maker and other advertising 22 agencies that only governed purchases related to</p>
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1 the 2020 census campaign; is that right?	1 and finish up.
2 A. Yes, because there was no other	2 THE VIDEOGRAPHER: Off the record.
3 way -- no other feasible way for the campaign to	3 The time is 4:13.
4 run. It was such a unique and bespoke example,	4 (Recess.)
5 that the normal processes would not have been	5 THE VIDEOGRAPHER: On the record.
6 able to -- would not have been feasible in order	6 The time is 4:25.
7 to make the campaign actually run.	7 BY MS. CLEMONS:
8 Q. Okay. Are you aware of any other	8 Q. Okay. Mr. Hardie, I just have a
9 federal agency advertisers that have had	9 couple more quick questions for you.
10 specific mention in advertising agency contracts	10 A. Okay.
11 with Google?	11 Q. Maybe more than a couple, but do
12 A. Say that again.	12 you know who Erin Corkins is?
13 Q. Are you aware of any federal agency	13 A. That name sounds familiar.
14 advertisers -- strike that.	14 Q. Okay. Do you know if she works
15 Are you aware of any contracts that	15 with Anthony Altimari or in that group?
16 Google has with ad agencies, other than the one	16 A. I don't believe she actually works
17 for the census, that are specific to a	17 with Anthony Altimari --
18 particular advertiser?	18 Q. Okay.
19 A. I'm not aware.	19 A. -- if I remember correctly.
20 MS. CLEMONS: Okay. Do -- all	20 Q. Okay. Do you know what a DVIP is?
21 right. I think we're going to take a short	21 A. Yes.
22 break, and then we'll come back on the record	22 Q. What is that?
Page 112	Page 113
1 A. Display and video incentive	1 A. Yes.
2 program.	2 Q. Okay. Was that signed by Veteran's
3 Q. And, briefly, what is a -- what is	3 Affairs or by their ad agency?
4 the display and video incentive program?	4 A. It was signed by Reingold.
5 A. It is essentially a volume discount	5 Q. Okay. DV360 -- I'm sorry to jump
6 for a certain level of display and video spend.	6 around here -- is DV360, does that include
7 Q. Okay. And is that volume discount	7 YouTube Select?
8 for an ad agency broadly or for a specific	8 A. YouTube Select is the most premium
9 advertiser?	9 inventory on YouTube. YouTube can be bought
10 A. It actually could be both or	10 through DV360, so kind of translatable property
11 either, I should say.	11 there, you can buy YouTube Select DV.
12 Q. Are you aware of any DVIPs that are	12 Q. Okay. So it can include YouTube
13 specific to federal agency advertisers?	13 Select?
14 MR. RYBNICEK: Objection to form.	14 A. Yes, it can.
15 A. There have been DVIPs on behalf of	15 Q. Or folks can buy YouTube Select
16 federal agencies before.	16 through other --
17 Q. Do you recall any specific ones in	17 A. You can buy YouTube Select directly
18 the past five years?	18 through Google Ads.
19 A. Veteran's Affairs.	19 Q. Okay. Are you familiar with GMP
20 Q. Okay. So there was a specific	20 order forms?
21 display and video incentive plan for Veteran's	21 A. Specific order forms?
22 Affairs?	22 Q. Or just the concept of Google

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1	Marketing Platform order forms?	1 it's, like, an order for ads to be placed.
2	A. Broadly.	2 Q. Okay. Do you know what a joint
3	Q. Do you know if those order forms	3 business plan is?
4	are specific to a particular advertiser with an	4 A. Yes.
5	ad agency or just the ad agency, broadly?	5 Q. Do you sometimes abbreviate that
6	A. I know that they could be specific	6 JBP?
7	to an advertiser, an advertiser specifically.	7 A. Yes.
8	But in terms of the various machinations and	8 Q. What is a joint business plan?
9	platforms that they could take, I couldn't say	9 A. It is a non-binding broad agreement
10	for sure.	10 on how we might work with an advertising agency
11	Q. Okay. Are you familiar with	11 on behalf of the ultimate advertiser over the
12	insertion orders?	12 course of a given period.
13	A. Yes.	13 Q. Are there joint business plans in
14	Q. Do you know if those are specific	14 place for the federal agency advertisers?
15	to particular advertisers?	15 A. Not all federal agency advertisers
16	A. Those are usually an IO level that	16 would have a joint business plan, but most
17	usually specific to a campaign. So then if it's	17 larger government federal agencies would have a
18	specific to a campaign, therefore, it would	18 joint business plan associated with them, to be
19	naturally be specific to a particular	19 clear, it would not be with the federal agency,
20	advertiser.	20 themselves, it's probably, again, it's a matter
21	Q. What is an insertion order?	21 of, like, how we work.
22	A. It's basically like an order form,	22 Q. Right.
	Page 116	Page 117
1	A. So in colloquial terms, it is kind	1 Google?
2	of like the agreement we are going to work with	2 A. There isn't necessarily a specific
3	this advertising agency on this ad over the	3 place, per se. Again, they are -- they are,
4	course of the next year, and here's	4 broadly, informal documents. And so they just
5	strategically what we are going to agree what	5 live in Google drive or, you know, we'll have --
6	are the things we're trying to do and how are we	6 maybe have a dashboard, as a team, but where --
7	going to work.	7 not even a dashboard but, like, a drive folder.
8	Q. Okay. Who maintains the joint	8 Q. Okay. Do you have an understanding
9	business plans for the federal agency	9 of whether your team's Google drive folders were
10	advertisers to have them?	10 produced in this litigation?
11	A. When you mean maintain what do you	11 A. No.
12	mean?	12 Q. Okay. With respect to your
13	Q. What group at Google is responsible	13 personal e-mail practices --
14	for creating and overseeing the joint business	14 A. Mm-hmm.
15	plans?	15 Q. -- do you typically communicate
16	A. It would be the sales team.	16 internally and externally via e-mail?
17	Q. So your team?	17 A. Typically? So internally and
18	A. Yes.	18 externally are two different things.
19	Q. With respect to yours, and Sean	19 Internally, primarily, I -- I -- I wouldn't say
20	Harrison's team with respect to the other four?	20 primarily, I guess primarily, technically. I
21	A. Correct.	21 mean, how we -- how we defining primarily?
22	Q. Okay. Where are those stored at	22 Q. How many -- how many e-mails would

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1	MR. RYBNICEK: Thank you.		1	CERTIFICATE OF SHORTHAND REPORTER	
2	THE WITNESS: Thank you.		2	I, Cassandra E. Ellis, Registered	
3	THE VIDEOGRAPHER: This concludes		3	Professional Reporter, the officer before whom	
4	today's deposition.		4	the foregoing proceedings were taken, do hereby	
5	We are off the record at 4:42.		5	certify that the foregoing transcript is a true	
6	(Signature having not been waived,		6	and correct record of the proceedings; that said	
7	the deposition of KENNETH MARCO HARDIE was		7	proceedings were taken by me stenographically	
8	concluded at 4:42 p.m.)		8	and thereafter reduced to typewriting under my	
9	ACKNOWLEDGMENT OF DEPONENT		9	supervision; and that I am neither counsel for,	
10	I, KENNETH MARCO HARDIE, do hereby		10	related to, nor employed by any of the parties	
11	acknowledge that I have read and examined the		11	to this case and have no interest, financial or	
12	foregoing testimony, and the same is a true,		12	otherwise, in its outcome.	
13	correct and complete transcription of the		13	IN WITNESS WHEREOF, I have hereunto	
14	testimony given by me and any corrections appear		14	set my hand this 15th day of November 2023.	
15	on the attached Errata sheet signed by me.		16	<i>Cassandra E. Ellis</i>	
16			17		
17			18		
18	(DATE)	(SIGNATURE)	19	CASSANDRA E. ELLIS, CSR-CA #14448, CCR-WA #3484,	
20			20	CSR-HI #475, RPR, RMR, RDR,	
21			21	CRR, REALTIME SYSTEMS	
22			22	ADMINISTRATOR #823848	
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1	ERRATA SHEET		1	ERRATA SHEET CONTINUED	
2	IN RE: UNITED STATES OF AMERICA, v. GOOGLE,		2	IN RE: UNITED STATES OF AMERICA, v. GOOGLE,	
3	LLC		3	LLC	
4	RETURN BY: _____		4	RETURN BY: _____	
5	PAGE	LINE	5	PAGE	LINE
6	_____	_____	6	_____	_____
7	_____	_____	7	_____	_____
8	_____	_____	8	_____	_____
9	_____	_____	9	_____	_____
10	_____	_____	10	_____	_____
11	_____	_____	11	_____	_____
12	_____	_____	12	_____	_____
13	_____	_____	13	_____	_____
14	_____	_____	14	_____	_____
15	_____	_____	15	_____	_____
16	_____	_____	16	_____	_____
17	_____	_____	17	_____	_____
18	_____	_____	18	_____	_____
19	_____	_____	19	_____	_____
20			20		
21	_____	_____	21	_____	_____
22	(DATE)	(SIGNATURE)	22	(DATE)	(SIGNATURE)

HIGHLY CONFIDENTIAL**ERRATA SHEET FOR THE TRANSCRIPT OF M. HARDIE**Case Name: *United States et al. v. Google LLC*, No. 1:23-cv-00108-LMB-JFA (E.D. Va.)

Dep. Date: November 14, 2023

Deponent: K. Marco Hardie

Page	Line	Correction	Reason for Correction
16	7	The phrase “other similar” should read “other civil”	Transcription error
18	7	The phrase “Have you spoken to anyone” should read “Have you met or spoken with anyone”	Transcription error
21	16-17	The phrase “military base” should read “military business”	Transcription error
33	18	The phrase “the US government client” should read “a US government client”	Transcription error
40	14	The phrase “centennial” should read “decennial”	Transcription error
41	21	The phrase “Michelle Henke” should read “Michelle Hinkes”	Transcription error
48	10	The phrase “advertiser products” should read “advertising products”	Transcription error
54-55	22-1	The phrase “with federal eight” should read “with federal agencies”	Transcription error
55	16-17	The phrase “Google-to-marketing platform team” should read “Google Marketing Platform team”	Transcription error
68	20-21	The phrase “search impression chair” should read “search impression share”	Transcription error
68	22	The phrase “90 percent impression chair” should read “90 percent impression share”	Transcription error
71	7	The phrase “if the campaign is running” needs to be inserted after “that is broadly meaning”	Transcription error
71	7-8	The phrase “if there’s ads being run” should read “and there’s ads being run”	Transcription error
71	8	The phrase “and data being generated” should read “and data being generated as a result”	Transcription error
71	11	The phrase “here’s how my campaign is running” should read “here’s how a campaign is running”	Transcription error

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81	12	The phrase “consumer government entertainment” should read “consumer government and entertainment”	Transcription error
84	3	The phrase “surface” should read “serve”	Transcription error
88	10	The phrase “amount of money and other vendors” should read “amount of money with other vendors”	Transcription error
107	10-11	The phrase “there wouldn’t be plays and fees” should read “there wouldn’t be platform fees”	Transcription error
116	3	The phrase “on this ad” should read “on behalf of this advertiser”	Transcription error

I have inspected and read my deposition and have listed all changes and corrections above, along with my reasons therefore.

Date: January 3, 2024

Signature: /s/ K. Marco Hardie